

Exhibit B

From: [Weiland, William H. \(CIV\)](#)
To: [Emi MacLean](#); [Bryant, Lauren E \(CIV\)](#); [Cappelletti, Daniel \(CIV\)](#); [Dichter, Anna L. \(CIV\)](#); [Hartman, Jeffrey M. \(CIV\)](#); [Kramer, Ilana R. \(CIV\)](#); [Ross, Catherine \(CIV\)](#); [Saenz, Rodolfo D. \(CIV\)](#); [Saylor, Amanda B \(CIV\)](#); [Snyderman, Eric M. \(CIV\)](#); [Wade, Shelby \(CIV\)](#)
Cc: [Ahilan Arulanantham](#); [Jessica Bansal Contact](#); [Erik Crew](#); [Minju Cho](#)
Subject: RE: NTPSA I - implementation of summary judgment order - request response by 3pm PST today
Date: Tuesday, September 9, 2025 3:06:13 PM
Attachments: [image001.png](#)

Emi,

Defendants dispute the allegations of noncompliance and will oppose both the motion for compliance as well as any associated motion to shorten time.

Best,
Will

William H. Weiland
(202)305-0770

From: Emi MacLean <EMacLean@aclunc.org>
Sent: Tuesday, September 9, 2025 12:41 PM
To: Weiland, William H. (CIV) <William.H.Weiland@usdoj.gov>; Bryant, Lauren E (CIV) <Lauren.E.Bryant@usdoj.gov>; Cappelletti, Daniel (CIV) <Daniel.Cappelletti@usdoj.gov>; Dichter, Anna L. (CIV) <Anna.L.Dichter@usdoj.gov>; Hartman, Jeffrey M. (CIV) <Jeffrey.M.Hartman@usdoj.gov>; Kramer, Ilana R. (CIV) <Ilana.R.Kramer@usdoj.gov>; Ross, Catherine (CIV) <Catherine.Ross@usdoj.gov>; Saenz, Rodolfo D. (CIV) <Rodolfo.D.Saenz2@usdoj.gov>; Saylor, Amanda B (CIV) <Amanda.B.Saylor@usdoj.gov>; Snyderman, Eric M. (CIV) <Eric.M.Snyderman@usdoj.gov>; Wade, Shelby (CIV) <Shelby.Wade2@usdoj.gov>
Cc: Ahilan Arulanantham <arulanantham@law.ucla.edu>; Jessica Bansal Contact <jessica@ndlcn.org>; Erik Crew <ecrew@haitianbridge.org>; Minju Cho <mcho@aclunc.org>
Subject: [EXTERNAL] RE: NTPSA I - implementation of summary judgment order - request response by 3pm PST today

Will,

In light of Defendants' refusal to update the website to comply with the Court's September 5 order, Plaintiffs have no choice but to move for compliance. We will do so today. Please let us know no later than noon PST Defendants' position on this motion, and a motion to shorten time.

Best,
Emi



Emi MacLean
Pronouns: she/her/hers
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From: Weiland, William H. (CIV) <William.H.Weiland@usdoj.gov>
Sent: Monday, September 8, 2025 3:47 PM
To: Emi MacLean <EMacLean@aclunc.org>; Bryant, Lauren E (CIV) <Lauren.E.Bryant@usdoj.gov>; Cappelletti, Daniel (CIV) <Daniel.Cappelletti@usdoj.gov>; Dichter, Anna L. (CIV) <Anna.L.Dichter@usdoj.gov>; Hartman, Jeffrey M. (CIV) <Jeffrey.M.Hartman@usdoj.gov>; Kramer, Ilana R. (CIV) <Ilana.R.Kramer@usdoj.gov>; Ross, Catherine (CIV) <Catherine.Ross@usdoj.gov>; Saenz, Rodolfo D. (CIV) <Rodolfo.D.Saenz2@usdoj.gov>; Saylor, Amanda B (CIV) <Amanda.B.Saylor@usdoj.gov>; Snyderman, Eric M. (CIV) <Eric.M.Snyderman@usdoj.gov>; Wade, Shelby (CIV) <Shelby.Wade2@usdoj.gov>
Cc: Ahilan Arulanantham <arulanantham@law.ucla.edu>; Jessica Bansal Contact <jessica@ndlon.org>; Erik Crew <ecrew@haitianbridge.org>; Minju Cho <mcho@aclunc.org>
Subject: RE: NTPSA I - implementation of summary judgment order - request response by 3pm PST today

Emi,

Good evening. The website will not be updated today.

Defendants are assessing their obligations under Judge Chen's ruling, which did not include any injunctive order to immediately update the website. Defendants also note they have moved for a stay of judgment pending appeal, which has yet to be ruled upon by the Court.

Best,
Will

William H. Weiland
Acting Assistant Director
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Civil Division
U.S. Department of Justice
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From: Emi MacLean <EMacLean@aclunc.org>
Sent: Monday, September 8, 2025 1:50 PM
To: Weiland, William H. (CIV) <William.H.Weiland@usdoj.gov>; Bryant, Lauren E (CIV)

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Subject: [EXTERNAL] NTPSA I - implementation of summary judgment order - request response by 3pm PST today

Will,

Please confirm that Defendants will update the website concerning TPS for Venezuela today in light of Judge Chen's ruling on Friday.

Pursuant to the order, Secretary Noem's decisions concerning the 2023 designation of Venezuela (the vacatur and the termination decisions) are set aside. This means that the January 17 decision by Secretary Mayorkas extending TPS remains in effect. This decision extends the 2023 Venezuela designation until October 2, 2026 for all Venezuelan TPS holders (whether they initially benefitted from the 2021 or 2023 designation) so long as they re-register by September 10. The January 17 decision also auto-extends the employment authorization documents of Venezuelan TPS holders through April 2, 2026.

The USCIS website does not reflect this. To comply with the order, USCIS must revise the website in connection with the 2023 redesignation of Venezuela for TPS such that:

- The “TPS Extended Through” date reads “October 2, 2026”;
- The “Re-registration period” date reads “September 10, 2025”; and
- The “Employment Authorization Document (EAD) Auto-Extended Through date reads “April 2, 2026” in addition to the language currently included regarding the district court’s May 30 order. In addition, the language regarding the May 30th order should be

modified to add this text in red "with a 'Card Expires' date of April 2, 2025 or September 10, 2025."

Please confirm by 3 pm today that these changes have been made. Given the September 10, 2025 deadline for re-registration, and the fact that hundreds of thousands of Venezuelan TPS holders had been without status as a result of the Supreme Court's stay grant, implementation of the Court's order is particularly urgent.

Emi



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